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Competition Policy Division  
Wireline Competition Bureau

25-1-16  
effective for sixty (60) days

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June 20, 2016

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Re: 89Degree Networks, LLC, Request for Special Temporary Authority  
Docket No. 16-193

Dear Ms. Dortch:

89Degree Networks, LLC ("89Degree Networks"), FRN 0021711809, pursuant to Section 214(a) of the Communications Act,<sup>1</sup> hereby requests Special Temporary Authority ("STA") for a period of sixty (60) days to allow 89Degree Networks to continue providing service to customers pending approval of the applications filed for transfer of control of 89Degree Networks' international and domestic Section 214 authority.<sup>2</sup>

On June 13, 2016, 89Degree Networks filed an application for Federal Communications Commission ("FCC" or "Commission") consent to the transfer of control of domestic and international Section 214 authority held by 89Degree Networks.<sup>3</sup> As explained in the pending transfer of control application, on December 31, 2015, Robert Crinks, who previously held a 4 percent interest in 89Degree Networks, acquired a 51 percent interest in the company from his spouse, Elaina Mangione, to bring his total ownership interest to 55 percent.

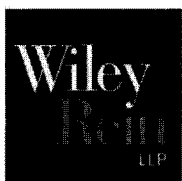
Prior approval for the transaction was not sought because neither Ms. Mangione nor Mr. Crinks understood that control had been transferred by virtue of their being married and Mr. Crinks continuing to exercise control in his capacity as President of the company.<sup>4</sup> 89Degree Networks regrets any misunderstanding, and will ensure that prior FCC consent is obtained for any future transfers of control.

<sup>1</sup> 47 U.S.C. § 214(a).

<sup>2</sup> 89Degree Networks withdraws its request for waiver of Section 63.03 of the Commission's rules, which requires prior FCC approval for a transfer of control. 47 C.F.R. § 63.03.

<sup>3</sup> 89Degree Networks' international Section 214 transfer of control application is pending in IBFS File No. ITC-T/C-20160613-00167.

<sup>4</sup> Compare 47 C.F.R. § 63.24(d), note 2 (identifying as a type of transaction that is "presumptively pro forma" a "[c]orporate reorganization that involves no substantial change in the beneficial ownership of the corporation ..."), with 47 C.F.R. § 1.2110(c)(5)(iii)(A) ("Both spouses



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Grant of the STA is in the public interest because it will allow 89Degree Networks to continue providing service to customers pending approval of the pending transfer of control applications.

89Degree Networks acknowledges that grant of its request for Special Temporary Authority will not prejudice action by the Commission, or other reviewing agencies, on the underlying Section 214 transfer of control application. 89Degree Networks also acknowledges that any authority granted pursuant to this request is subject to cancellation or modification upon notice, but without a hearing.

Respectfully Submitted,

*/s/ Bennett L. Ross*

Bennett L. Ross

*Counsel for 89Degree Networks, LLC*

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(Continued . . .)

are deemed to own or control or have the power to control interests owned or controlled by either of them").